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COUNSEL/PARTIES OF RECORD	
APR 14 2017	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
vs.
GAMALIEL ZAVALA ENRIQUEZ,
Defendant.

CASE NO. 2:14-CR-0360-RFB-GWF

SEALED

**MOTION TO REMOVE DEFENDANT
FROM RANDOM DRUG TESTING**

Defendant Gamaliel Zavala Enriquez, through counsel, Richard A. Wright, Esquire of WRIGHT STANISH & WINCKLER, moves the court to remove defendant from random drug testing requirement.

Mr. Enriquez has entered a plea agreement with the United States in which he has agreed to cooperate with the United States in connection with its ongoing investigation of fraudulent grant funding schemes. The defendant has begun to cooperate with the United States in this investigation and may testify at the upcoming trial in *U.S. v. Charlene Scott, Case No. 2:15-CR-00193-JAD-PAL* which is set for Trial on July 25, 2017.

Mr. Enriquez has been subjected to random drug testing for over three years now and not once has a test come back positive. Mr. Enriquez will continue his cooperation in this matter.

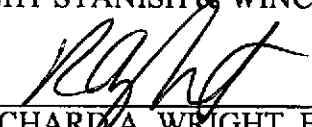
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1 Mr. Enriques is out of custody and his sentence is currently scheduled for September 7, 2017.

2 DATED this 14th day of April, 2017.

3 Respectfully submitted:

4 WRIGHT STANISH & WINCKLER

5 BY 
6 RICHARD A. WRIGHT, ESQUIRE
7 Attorney for Defendant Enriquez

8 ORDER

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10 IT IS SO ORDERED.

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12 RICHARD F. BOULWARE, II
13 United States District Judge

14 DATE: June 8, 2017.
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 14th day of April, 2017, I caused a copy of the foregoing **MOTION TO REMOVE DEFENDANT FROM RANDOM DRUG TESTING** to be served via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list and/or emailed, hand delivered, facsimile or placed in the United States mail, postage prepaid, to the following persons at their last known address as listed below:

Ronald Pease
U.S. Pretrial Officer
Lloyd D. George U.S. Courthouse
333 Las Vegas Boulevard South
Suite 1112
Las Vegas, NV 89101

BY 
An employee of Wright Stanish & Winckler